UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEW JERSEY

Defense Distributed, Second Amendment Foundation, Inc., Firearms Policy Coalition, Inc., Firearms Policy Foundation, The Calguns Foundation, California Association of Federal Firearms Licensees, Inc., and Brandon Combs,

Plaintiffs,

v.

Gurbir Grewal, Attorney General of the State of New Jersey,

Defendant.

No. 3:19-cv-04753-AET-TJB

Plaintiffs' Notice of Motion for a Preliminary Injunction

BECK REDDEN LLP
Chad Flores
cflores@beckredden.com
Daniel Hammond
dhammond@beckredden.com
Hannah Roblyer
hroblyer@beckredden.com
1221 McKinney Street, Suite 4500
Houston, Texas 77010
(713) 951-3700

HARTMAN & WINNICKI, P.C. Daniel L. Schmutter dschmutter@hartmanwinnicki.com 74 Passaic Street Ridgewood, New Jersey 07450 (201) 967-8040

Josh Blackman*
joshblackman@gmail.com
1303 San Jacinto Street
Houston, TX 77002
(202) 294-9003
*Pro hac vice motion to be filed

Counsel for Plaintiffs

PLEASE TAKE NOTICE that:

- 1. On March 20, 2019, Plaintiffs will move for the entry of a preliminary injunction against Gurbir Grewal, New Jersey Attorney General. *See* Fed. R. Civ. P. 65.
- 2. Plaintiffs will support the motion with their amended complaint and the brief, declarations, and other evidence submitted herewith.
 - 3. Plaintiffs request oral argument.
 - 4. Plaintiffs submit a proposed form of order herewith
- 5. Plaintiffs request expedited consideration because of the action's extraordinary constitutional concerns, because irreparable injury is occurring now, and because further irreparable injury is imminently threatened.

Date: February 20, 2019

BECK REDDEN LLP Chad Flores cflores@beckredden.com Daniel Hammond dhammond@beckredden.com Hannah Roblyer hroblyer@beckredden.com 1221 McKinney Street, Suite 4500 Houston, Texas 77010 (713) 951-3700 Respectfully submitted,

HARTMAN & WINNICKI, P.C. s/ Daniel L. Schmutter
Daniel L. Schmutter
dschmutter@hartmanwinnicki.com
74 Passaic Street
Ridgewood, New Jersey 07450
(201) 967-8040

Josh Blackman*
joshblackman@gmail.com
1303 San Jacinto Street
Houston, TX 77002
(202) 294-9003
*Pro hac vice motion to be filed

Counsel for Plaintiffs